

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FUJIAN MINGTA TOYS CO. LTD.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 1:24-cv-05625-JRB-

**Honorable Judge John Robert Blakey
Magistrate Judge Heather K. McShain**

DECLARATION OF WENJUN LI

I, Wenjun Li, of the City of Xiamen, in the Province of Fujian, People’s Republic of China declare as follow:

1. I am an employee working at Meizhigao intellectual property services (Xiamen) Co., LTD (“MIPS”) in Xiamen China.

2. MIPS is a cooperating partner with Bayramoglu Law Offices LLC (“BLO”) which represents Zhejiangaoguangwanjuyouxianzerengongsi dba TOPBRIGHT (“TOPBRIGHT”) and Ningbo Sun Top Trade Co. Ltd. dba SuntopDirect (“SuntopDirect”, collectively the “Defendants”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify as follows:

3. This Declaration is made in support of Defendants’ Motion to Enforce Settlement.

4. The Defendants reached settlement with FUJIAN MINGTA TOYS CO. LTD. (“Plaintiff”) on January 13, 2025.

5. In its settlement with Plaintiff, TOPBRIGHT agreed to pay the amount of [REDACTED] to Plaintiff.

6. In its settlement with Plaintiff, SuntopDirect agreed to pay the amount of [REDACTED] to Plaintiff

7. Plaintiff did not provide fully executed settlement agreements quickly after receiving the executed agreements from Defendants.

8. I received notice that attorney William Brees at BLO did not receive a response for several days to emails he sent to attorney Nick Najera at Ni, Wang & Massand, PLLC (“NWM”), attorneys for Plaintiff, requesting the fully executed settlement agreements.

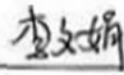
9. I requested help from Tim Wang at NWM, in obtaining the fully executed agreements from Plaintiff.

10. In response to my request, Tim Wang informed me that Plaintiff would now require [REDACTED] total from the Defendants in order to release the Defendants from this action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 31st day of January 2025 at Xiamen, Fujian, PR China.

By:



Wenjun Li

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ William R. Brees
William R. Brees (FL Bar No. 98886)
BAYRAMOGLU LAW OFFICES LLC